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Please reply to New Jersey

November 12, 2010

VIA E-FILE

The Honorable Dickinson R. Debevoise
U.S. District Judge, United States District Court
United States District Court - Newark
Martin Luther King Jr. Federal Building and U.S. Court
50 Walnut Street
Newark, NJ 07101

RE: **WALSH SECURITIES, INC. VS. CRISTO PROP.**

Our File No. : 45987 MRM

Docket No. : 2:97-CV-03496

Dear Judge Debevoise:

I represent the defendant Coastal Title agency. My motion to dismiss the Crossclaims of the codefendant title insurance companies (represented by Mr. Kott and Mr. Hayes) is presently returnable before Your Honor this Monday, November 15, 2010. I write to request a further adjournment of the motion, with the consent of Mr. Kott, Mr. Hayes and plaintiff's counsel, Mr. Magnanini.

Just yesterday, I was informed by Mr. Magnanini that the corporate entity plaintiff, Walsh Securities, Inc, had filed for Chapter 11 Bankruptcy protection. Based upon conversations between all counsel, it is our request that the motion be carried indefinitely, so as to allow each of us to reassess our respective positions in light of this revelation. I can also inform Your Honor that, as late as yesterday, settlement negotiations were on going.

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All counsel were present yesterday when Mr. Kott attempted to call Chambers, but of course it was a holiday. I apologize for the "eleventh hour" aspect of this, but it could not be avoided. May I please hear from Your Honor at your earliest convenience regarding this request.

Very truly yours,

METHFESSEL & WERBEL, ESQS.

A handwritten signature in dark ink, appearing to read "Martin R. McGowan". The signature is fluid and cursive, with a large, stylized initial "M" and a long, sweeping tail.

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MRM:daf.

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